



March 13, 2018

Repp Law Firm
1629 K Street, N.W., Suite 300
Washington, D.C. 20006-1631
T 202.656.1619
F 202.400.3737
marissa@repplawfirm.com
www.repplawfirm.com

Via Electronic Filing

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

**Re: Notice of *Ex Parte* Communication with David Grossman,
Chief of Staff and Media Policy Advisor
to Commissioner Mignon Clyburn
RM-11727; RM-11643**

Dear Ms. Dortch:

The following telephone conference summary is submitted pursuant to 47 C.F.R. Section 1.1206(b)(1).

On March 12, 2018, Jeff Littlejohn, Executive Vice President - Engineering & Systems Integration, iHeartCommunications, Inc. (together with iHeartMedia + Entertainment, Inc., "iHeart"), Sara Morris, Senior Director, Government Affairs, and Jessica Marventano, Senior Vice President, Government Affairs, iHeart, spoke by telephone with David Grossman, Chief of Staff and Media Policy Advisor to Commissioner Mignon Clyburn. Also on the phone call were Dan Dukes, Senior Director, Government Affairs, iHeart, and the undersigned.

Mr. Littlejohn noted that the Commission should evaluate whether the creation of a new C4 FM station class in fact would have the potential to assist a meaningful number of stations, given that most Class A stations took a prior opportunity afforded by the Commission to double their power. Mr. Littlejohn stated that the key concern would be the adoption of a triggering system, which would result in current radio stations with under-maximum facilities losing a protection buffer that could impede their ability to relocate. Given the demands on towers due to the TV repack, whereby TV stations are being consolidated on towers and forcing out radio stations, and other pressures on tower access, such as zoning changes and lease terminations, radio stations facing involuntary transmitter relocations could face taking a downgrade and losing coverage under a trigger system. Moreover, given the current financial environment for radio

Marlene Dortch, Secretary
March 13, 2018
Page 2

stations, under-maximum stations that would be subject to a trigger – including those owned by minorities and/or women -- but are not in a current financial position to make the capital expenditures necessary to upgrade their facilities, would be permanently locked into subpar facilities by a trigger process.¹ Mr. Littlejohn also noted that proposals to add Class C4 stations would necessarily reduce the spectrum available for LPFM, FM translators and improvements by existing FM radio stations.

Respectfully submitted,

REPP LAW FIRM

By: 
Marissa G. Repp

Counsel to iHeartCommunications, Inc.

cc: David Grossman (via e-mail)

¹ iHeart participated previously in a Joint Statement with other broadcasters noting the detriments to the public and the FM band of the SSR Communications, Inc. proposal to limit interference protection for all FM stations to the contour protections of Section 73.215, rather than protection to the maximum class facilities. *See* RM-11643, Joint Statement of Beasley Broadcast Group, Inc., Bryan Broadcasting Corporation, Clear Channel Communications, Inc., Delmarva Broadcasting Company, Merlin Media License, LLC, and Radioactive, LLC (October 28, 2011).